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Subject: FW: Horizon Kodiak - Request for ECA Exemption on 2/5/14 - LSFO Contaminated

From: Horizon Kodiak Master [mailto:master.kodiak@horizonlines.com]

Sent: Tuesday, February 04, 2014 8:56 PM

To: USCG Sector Puget Sound

Cc: John.W.Winters@uscg.mil; Gretchen.M.Bailey@uscg.mil; Johnson, Craig; Ellis, Danny; Belviso, Jim

Subject: Horizon Kodiak - Request for ECA Exemption on 2/5/14 - LSFO Contaminated

Good morning,

The MV Horizon Kodiak is requesting an Exception to the requirement to burn low sulfur fuel oil in the North American ECA under the terms of MARPOL Annex VI Regulation 3.1.1

It has been established through laboratory testing that the LSFO inventory currently aboard is a serious threat to the continued safe operation of the ship and we are requesting a one-time exception that will allow us to burn Heavy Fuel Oil and safely enter the Port of Tacoma WA on 2/6/14. Horizon Lines Purchasing Department is working feverishly to resolve this issue, with the goal being to debunker the bad LSFO and then bunker with a clean batch of LSFO on Friday, 2/7/14. These arrangements are ongoing. The off-grade LSFO currently in hand has been found to contain a high level of polymers which will cause severe problems with the vessel's fuel purifying system, including potential interruption of flow to the main engine and auxiliary generators. The vessel has exhausted all proper spec LSFO and only contains approximately 500 MT of polymer contaminated LSFO.

Below are the specifics of our request:

Horizon Kodiak

US Flag

IMO 8419166

Voyage Plan: The vessel is currently enroute from Kodiak, AK bound for Tacoma, WA via the Strait of Juan De Fuca and the Port Angeles Pilot Station. At approximately 0030 PST the vessel will enter the North American ECA off the west coast of Canada and will proceed 833 nautical miles to Tacoma, WA. The transit inside the ECA will take approximately 43 hours, 30 minutes.

This fuel problem was first identified on Monday morning, 2/3/14 when transiting from Anchorage to Kodiak, AK. Upon energizing one of the LSFO purifier centrifuges, an Assistant Engineer noticed the purifier experienced difficulty increasing its revolutions and began to smoke. The purifier was immediately taken off line and opened for inspection. (Please see attached photo's) Our Chief Engineer was aboard a sister ship when they encountered contaminated LSFO with polymers approximately one year ago and quickly deducted the similarities of the burnt residue. He immediately contacted the company, informed the other vessels and requested a specific test for polymers which was confirmed positive this afternoon.

Compliance attempts: At this time, we have no other source of LSFO onboard except the contaminated #5 fuel oil tanks. Our other two LSFO tanks that contained a clean batch of fuel are now empty.

The safe and prudent operation of the vessel was called into question upon receipt of the LSFO test results obtained from Oil Test Marine Services. (Please see attachment) which stated: "FTIR analysis on the "Toluene Insoluble" identify the materials as High Density

Polyethylene." Consumption of the off-spec LSFO will yield large amounts of sludge that will clog our fuel purifying system and jeopardize uninterrupted flow of fuel to the main engine and auxiliary generators. In other words, consumption of this fuel could seriously compromise the safe navigation of this vessel, and could ultimately endanger the crew and environment.

To ensure the continued safe operation of the vessel, the Master and Chief Engineer agree that the vessel should burn only HFO until additional quantities of on-grade LSFO are in hand. Upon verification of appropriate spec LSFO, the re-bunkering of the ship will hopefully take place at 0600 PST, Friday, 2/7/14. The sulfur content of the HFO to be consumed in the ECA is 1.92%.

Should you have any questions regarding our request, please contact the following:

Vessel: master.kodiak@horizonlines.com Satellite
phone: 011 870 764 575 215 cell phone: 253-905-8343

Captain Danny Ellis

Vessel Supt: dellis@horizonlines.com
Office phone: 253-207-4042
Cell phone: 253-686-8228

Please respond at your first opportunity to our request for this brief, one-time Exception.

Thank you,

Nick Christian, Master
M/V Horizon Kodiak